

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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ELITE PHYSICIAN SERVICES, LLC,

: **No. 1:07-cv-3097 (BSJ)**

Plaintiff,

: **The Honorable Barbara S. Jones**

v.

: **NOTICE OF MOTION TO  
APPEAR PRO HAC VICE**

CITICORP CREDIT SERVICES, INC. (USA), :

Defendant. :

:

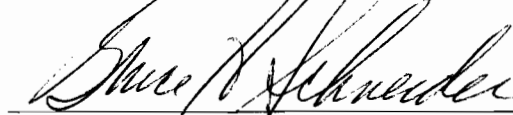
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Defendant Citicorp Credit Services, Inc. (USA) by its counsel Stroock & Stroock & Lavan LLP, pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York will move this Court before the Honorable Barbara S. Jones at the Courthouse located at 500 Pearl Street, New York, NY 10007 for an Order granting permission to Nancy M. Lee, a member in good standing of the Bar of the State of California, to participate in these proceedings. This motion is made on submission. The attached declaration of Bruce H. Schneider and the exhibits thereto provide further support for this motion. A proposed order is attached hereto.

Dated: July 12, 2007  
New York, New York

STROOCK & STROOCK & LAVAN LLP



Bruce H. Schneider (BHS-7808)

180 Maiden Lane  
New York, New York 10038  
(212) 806-5400  
*Attorneys for Defendant*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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ELITE PHYSICIAN SERVICES, LLC,	: No. 1:07-cv-3097 (BSJ)
Plaintiff,	: The Honorable Barbara S. Jones
v.	: <b>DECLARATION OF BRUCE H.</b>
CITICORP CREDIT SERVICES, INC. (USA),	: <b>SCHNEIDER IN SUPPORT OF</b>
Defendant.	: <b>MOTION TO APPEAR</b>
	: <b><u>PRO HAC VICE</u></b>
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**BRUCE H. SCHNEIDER**, declares under the penalty of perjury that the foregoing is true and correct:

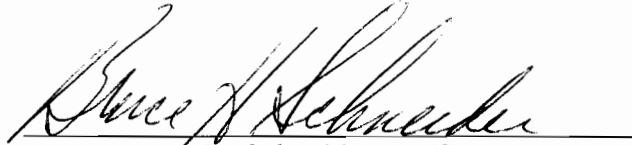
1. I am an attorney duly admitted to practice in the courts of the State of New York and in this Court, and am a member of the firm of Stroock & Stroock & Lavan LLP, counsel for defendant Citicorp Credit Services, Inc. (USA) (“CCSI”). I submit this declaration in support of the motion to admit Nancy M. Lee (“Ms. Lee”) to appear pro hac vice in this action on behalf of CCSI.

2. Ms. Lee practices law at the law firm of Stroock & Stroock & Lavan LLP, 2029 Century Park East, Los Angeles, CA 90067-3086 and is a member in good standing of the Bar of the State of California. Ms. Lee’s Declaration in support of this Motion is annexed hereto as Exhibit A, and her Certificate of Good Standing is annexed hereto as Exhibit B. The proposed order is annexed hereto as Exhibit C.

3. I respectfully request that the Court grant this motion and permit Ms. Lee to practice before this Court pro hac vice as counsel for CCSI in these proceedings.

Dated: July 12, 2007  
New York, New York

Respectfully submitted,



Bruce H. Schneider (BHS-7808)

STROOCK & STROOCK & LAVAN LLP  
180 Maiden Lane  
New York, New York 10038  
(212) 806-5400  
*Attorneys for Defendant*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

----- X  
ELITE PHYSICIAN SERVICES, LLC, : **No. 1:07-cv-3097 (BSJ)**  
 :  
Plaintiff, : **The Honorable Barbara S. Jones**  
 :  
v. : **AFFIRMATION OF NANCY M.**  
 : **LEE IN SUPPORT OF MOTION TO**  
CITICORP CREDIT SERVICES, INC. (USA), : **APPEAR PRO HAC VICE**  
 :  
Defendant. :  
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NANCY M. LEE, under penalty of perjury, declares as follows:

1. I am an associate of the law firm of Stroock & Stroock & Lavan LLP.
2. I submit this affidavit in support of my motion for admission to practice pro hac vice in the above captioned matter.
3. As shown in the Certificate of Good Standing annexed hereto, I am a member in good standing of the Bar of the State of California.
4. There are no pending disciplinary proceedings against me in any State or Federal Court.
5. Wherefore I respectfully submit that I be permitted to appear as counsel and advocate pro hac vice in this one case.

6. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: Los Angeles, California  
July 10, 2007

A handwritten signature in black ink, appearing to be 'Nancy M. Lee', written over a horizontal line.

Nancy M. Lee

STROOCK & STROOCK & LAVAN LLP  
2029 Century Park East  
Los Angeles, California 90067  
Tel: (310) 556-5800  
Fax: (310) 556-5959



# THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

July 5, 2007

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, NANCY MILEE, #232708 was admitted to the practice of law in this state by the Supreme Court of California on December 1, 2004; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in black ink, reading "J. Robert McPhail".

J. Robert McPhail  
Custodian of Membership Records

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

----- X  
ELITE PHYSICIAN SERVICES, LLC, : **No. 1:07-cv-3097 (BSJ)**  
  
Plaintiff, : **The Honorable Barbara S. Jones**  
  
v. : **ORDER**  
  
CITICORP CREDIT SERVICES, INC. (USA), :  
  
Defendant. :  
:   
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Upon the annexed Declaration of Bruce H. Schneider, Esq. and the exhibits attached thereto, it is hereby:

ORDERED that Nancy M. Lee is granted leave to appear pro hac vice in the above action as counsel for defendant Citicorp Credit Services, Inc. (USA).

Dated: July \_\_, 2007  
New York, New York

\_\_\_\_\_  
United States District Judge

